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Animal Welfare; Standards for Ferrets

By Mike Morrett

A Brief History

In a petition dated March 4, 2004, the International Ferret Congress (IFC) and organizations requested that Animal Plant Health Inspection Service (APHIS) a division of the U.S. Department of Agriculture (USDA) develop and promulgate specific standards for the care and handling of the domestic ferret. The American Ferret Association (AFA) issued information during a meeting conducted in 2004 with the USDA in reference to "best practices" concerning ferret welfare. The IFC petition was accepted and entered into the Federal Register VOL 70, No 150 on August 5, 2005. Docket No. 04-088-1 was issued and opened for public comment on August 5, 2005. Public comments for review were closed November 18, 2005.

Current Standard

The Animal Welfare Act (AWA) was written and drafted in 1966. Its intent was to cover animal welfare under general terms. Since 1996, species specific standards and regulations have been developed under APHIS for species such as dogs, cats, guinea pigs, hamsters, rabbits, nonhuman primates and marine mammals. Ferrets are currently covered under Subpart F, with "other warm blooded mammals". Subpart F does not provide for adequate regulations specifically addressing the unique needs of the ferret.

Reason for Change

Poor physical and medical condition of ferrets received at pet stores for retail sales to the general public. According to the IFC, a study was conducted involving 96 ferrets shipped from five commercial breeders to retail pet stores. Some were very young kits; as young as four weeks of age. The observations taken indicated a wide variety of medical issues, with a direct correlation between lower age and extent of illness. Many of the younger kits were unfit for sale without medical attention or further growth development. The average veterinary visit for these ferrets was \$271.38. This and similar reports from ferret owners prompted the IFC and the ferret community to request a specific standard by APHIS to regulate minimum age of shipment, handling, transportation and care for the domestic ferret.

Proposed Standards

With the widely known medical issues concerning very young ferrets received at pet stores, the IFC has taken the initiative to write specific standards for the domestic ferret. In Europe, the mistreatment of pets has prompted the EU to develop over several years specific standards governing the welfare of all domesticated animals, including the domestic ferret. The EU standards went in affect on January 1, 2005. Similar proposed new USDA regulations would cover housing facilities and environmental conditions (including temperature minimums and maximums), cage size, exercise, feeding and watering, and transportation issues (including a minimum age for shipping).

Public Comments Submitted to APHIS

The proposal was covered in detail by the IFC at the 2005 Ferret Symposium held in St Louis last June. The AFA developed a form letter that was widely distributed within the ferret community and instituted a campaign, working through their members and other organizations to alert ferret owners, shelters, hobby breeders and veterinarians of the proposed changes to the AWA.. This campaign was achieved using AFA's and IFC's website, email and electronic group notices distributed by AFA's membership committee, mass efforts at three Fall AFA shows to all show-goers, discussion and handout at AFA's Veterinary Symposium, and a large-scale mailing from AFA's database. The AFA members and other ferret enthusiasts responded in a big way by sending in form letters, writing their own personal letters and getting friends and family to also send in letters to support ferret-specific regulations. The AFA's efforts account for over two-thirds of the response! and made a big impact towards gaining protection for the ferrets. Total submissions between August 5 and November 18, 2005 were about 1,500. Over 500 individual letters were submitted either by US mail or emails directly to APHIS. The AFA form letter resulted in over 900 individual signed form letters being submitted. Of the 1,500 submissions, about two dozen were against the proposed AWA new standard. The objections were from the commercial breeders, suppliers, research laboratories controlled by the USDA. There were several small private pet store establishments that were opposed. One large national pet store chain was in agreement with the new proposed standard. There were no comments from the balance of the major pet store chains.

The Affect

If the proposed standards are accepted by APHIS, what are the ramifications in the commercial ferret breeding establishments and suppliers to the general public? Large breeders may have to make modifications to their facilities to meet new standards, and keep kits with their mothers longer before neutering and spaying and implement changes in transporting ferrets. This may raise the cost of ferret kits to the general public, but will be offset by healthier animals and fewer veterinary bills. It should be noted that only breeders and other businesses currently under USDA jurisdiction will be affected by new regulations. Small private breeders who only sell directly to the public will not be affected. Pet stores are covered by state and local regulations, and would also not be affected.

Looking Forward

The outcome of the proposed standard is now in the hands of APHIS. The decision process will involve the review of all public comment submissions, the validity of the proposed new standard and the economic impact on the community. Their review will entail specific analysis of factual data and looking at the current environmental conditions that the domestic ferret is now covered under the AWA, Subpart F. Is there a possibility under the current AWA standards allowing for mistreatment as reported? If there is a large economic impact where commercial breeders would be forced to close due to occurrence of higher production cost, then what is the trickle down affect of pet store ferret sales, food suppliers and associated ferret related products.

The IFC issued a 9 page letter to APHIS on November 18, 2005. Covered in detail are the biological nature of the ferret, illness observed on arrival at pet stores, cost to the consumer treating ill ferrets and the deficiencies of Subpart F of the AWA. Recommendations of alterations to the AWA were also submitted.

Chances of Passage

At this point there is a positive outlook that the proposed new standard will be written into the AWA for the following reasons;

- The IFC and other ferret organizations and individuals have sent factual data indicating AWA, Subpart F does not support the welfare of the domestic ferret and specific standards must be developed.
- Maine and New Hampshire now have laws requiring the minimum age of eight weeks for shipment from commercial breeders to retail stores.
- Within the public comment period there was an overwhelming support from the AFA, IFC, ferret clubs and shelters, hobby ferret breeders, veterinarians and individual ferret owners. There were very few negative comments against the ruling change.
- There are specific standards incorporated into the AWA for dogs and cats, guinea pigs and hamsters, rabbits, nonhuman primates and marine mammals. Over the last several decades, the domestic ferret has grown greatly in popularity as a pet. This indicates a specific standard for the domestic ferret is required.
- The proposed standards by the IFC will be debated. APHIS may consider a compromise be determined between the proposed standards and the commercial breeders and suppliers. The minimum age requirements, eight weeks for shipment will be the major debating issue.

Docket No. 04-088-1 has now been accepted and the public comment period has been closed. The docket will be entered in the APHIS ruling section. The final ruling and writing of the standards may take anywhere from one to two years. This is dependent on the amount of prior issues waiting on decisions from APHIS. After the ruling has been accepted, standards written and put into law, it could be at least another year before the ruling goes into affect.

Without the dedication and the enormous amount of research and development from the International Ferret Congress this much needed ruling change would not be in a position to change the welfare of the domesticated ferret. Thanks to Judy Cook, Julie Fossa, Linda Iroff and a special thanks to Sandra Kudrak DMV, DABVP for developing the new proposed standard and conducting the research on pet store kits. Thanks to the American Ferret Association for presenting the issues to the ferret community that drastically increased public comment to the USDA. Thanks to the members of the International Ferret Congress, the American Ferret Association's members and all the individuals that took time to write individual letters to USDA and to those who encouraged others to write.